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**From:** Thiesing, Mary [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B7B594716A844C65BD55C43A6B033F58-THIESING, MARY ANN]  
**Sent:** 6/2/2017 6:00:32 PM  
**To:** Bujak, Charissa [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b7145378c12f43df9e2bf70e7d951196-Bujak, Char]  
**Subject:** RE: US 95 Thorncreek Rd to Moscow -- IDFG; rare plant; changes to aquatic resource impacts assessment since FEIS  
**Attachments:** US 95 Thorncreek - Moscow Fact Sheet 6.2.2017 MAT comments clean.docx; US 95 Thorncreek - Moscow Fact Sheet 6.2.2017 MAT comments.docx

Hi Charissa,

I'm attaching a marked-up version of the document as well as a "clean" version. The clean version is actually more up to date, and you can restore the markups by turning on markups in track changes. If you accept the changes, make sure you do that so that the markups aren't available to the next reader.

A couple of observations on how we format fact sheets. First, they aren't done on formal memo letterhead; that is reserved for interoffice, formal/official communications and/or outside agency communications, as well as to formalize a memo for the record. The Fact sheet format we use is intended as an internal and less format. The kinds of information that are needed are generally consistent, but sometimes a particular senior staffer wants to know specific kinds of things, and so what we provide them is dependent on what their management style suggests. The important thing is to be as concise as possible while not editing out relevant facts. Doing this is an art and it takes time to learn it—I think you made an excellent start. I did a lot of moving around of text and some crossing out and addition, but most of it was on style and not substance, so don't freak out.

Take a look and we can talk about this if you want. In addition to the fact sheet (when it is finished) I would recommend including in the final package a copy of the PN, a copy of our September 2015 comment letter on the FEIS, a copy of the table from the ROD showing the impacts of the 3 different alternatives, and the two maps that I suggested previously. When you're comfortable with a version of the Fact sheet, I would route it to Elaine and Hanh for their comments, and finalize from there.

Give me a call if you need. I am working on spreadsheet analysis but have no meetings scheduled, and this formatting stuff is complicated.

Mary Anne

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**From:** Bujak, Charissa  
**Sent:** Friday, June 02, 2017 7:05 AM  
**To:** Thiesing, Mary <Thiesing.Mary@epa.gov>  
**Subject:** RE: US 95 Thorncreek Rd to Moscow -- IDFG; rare plant; changes to aquatic resource impacts assessment since FEIS

Hi,

Sorry, this version was more updated. Thanks!

Cheers,  
Charissa

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**From:** Thiesing, Mary  
**Sent:** Friday, June 02, 2017 6:51 AM  
**To:** Somers, Elaine <somers.elaine@epa.gov>; Bujak, Charissa <bujak.charissa@epa.gov>; Peak, Tracy <Peak.Tracy@epa.gov>; Storm, Linda <Storm.Linda@epa.gov>  
**Subject:** RE: US 95 Thorncreek Rd to Moscow -- IDFG; rare plant; changes to aquatic resource impacts assessment since FEIS

Elaine, this is very helpful, and I suspect David will want to know this when we brief him next week.

**From:** Somers, Elaine

**Sent:** Thursday, June 01, 2017 9:51 PM

**To:** Bujak, Charissa <bujak.charissa@epa.gov>; Peak, Tracy <Peak.Tracy@epa.gov>; Thiesing, Mary <Thiesing.Mary@epa.gov>; Storm, Linda <Storm.Linda@epa.gov>

**Subject:** US 95 Thorncreek Rd to Moscow -- IDFG; rare plant; changes to aquatic resource impacts assessment since FEIS

Hello, everyone,

A bit more information that may be of interest...

#### **IDFG**

I did have a conversation with Ray Hennekey of IDFG yesterday. It's a good thing, **Personal Privacy / Ex. 6** (he'll be gone from the office from June 10 onward).

Ray re-stated the essence of IDFG's views on the project: They support the Central (C-3) alignment. C-3 has the least wetland impacts, least wildlife impacts, and it is supported by all the resource agencies.

Since we last spoke, he has been working with ITD on pipe crossings of the E-2 alignment. He conveyed that ITD consults with IDFG because they have to, but that they do what they want to do.

He said the only wildlife mitigation is to oversize some of the pipes (culverts) for small wildlife passage. For example, some 24" pipes may be increased to 36" or 48", or a 48" pipe increased to 60". The problem, however, is that the pipes are very long, and it is unlikely that wildlife will enter if it is dark, i.e., if they cannot see the end of the tunnel. A 24" pipe typically used for a 50-year event is increased to 36" or 48", so that when a stream is bank full, small wildlife could pass on the banks at either side, but sometimes the pipes will be full and will not be usable by wildlife.

For contacts at USFWS, Ray recommended Juliet Barrente, Spokane Office 509-893-8005 or direct line 509-921-0160. Or, speak with Juanita Lichthardt, Botanist at U of Idaho, Moscow, re: plant questions: 208-882-4803.

#### **Rare plant**

FYI -- On the call I mentioned that in recent years spanned by this NEPA process, ITD had bulldozed or buried (not intentionally as far as known) a rare plant population. It was Spalding's catchfly, *Silene spaldingii*, an ESA Threatened species. It may have occurred when they were building the other portions of US95 that were expanded, but which were covered by the original EA -- not included in this EIS. The PN states that no specimens of *S. spaldingii* have been located near the proposed project area since 2006.

#### **Aquatic resources impacts – data changes since the FEIS**

**From the FEIS (p. 172) Table 46. Tributary Effects:**

- **Alternative C-3:** 5 tributary crossings; 7,808 linear feet of channel effects; 58 acres total impervious surface
- **Alternative E-2:** 5 tributary crossings; **2,592 linear feet** of channel effects; 72 acres total impervious surface
- FEIS (p. 173): "Most of the wetlands that are affected drain into either the South Fork of the Palouse River or Thorn Creek, both of which are on the 303(d) list and are waters of the US."
- Mitigation (p. 173): "Once all practicable measures for avoidance and minimization are in place, remaining impacts will be mitigated through compensatory mitigation, which will be met through use of the Cow Creek Mitigation site, which has already been constructed."
- P. 174, Table 47, Wetland Effects: Alt C-3: 0.99 acre (all PEM); Alt E-2: 3.61 acres (2.69 PEM; 0.92 PSS)
- P. 176: "The E-2 Alt would affect more wetlands that are functioning higher for habitat. The C-3 Alt would have the least effect to wetlands in terms of acreage, function and value."

**From the Corps Public Notice:**

- **Alternative E-2:** Piping of **4,290 linear feet** of unnamed tributaries/drainages.

- Aquatic resource description: Both S. Fork Palouse River and Thorn Creek originate on Paradise Ridge. ES Comment/note: The E-2 impacts would affect the headwater areas (upstream of where Alts C-3 and W-4 are located), with higher likelihood of degrading water quality in upper (intermittent) stream reaches that may currently be unimpaired. Would also impair sensitive hydrological functions. E-2 is only alternative that impacts scrub-shrub wetlands, which are rare to non-existent elsewhere in the project area, and are high value to wildlife on Paradise Ridge.
- Permanent fill of 3.43 acres wetlands (3.23 PEM; 0.20 PSS)

Let me know if there is anything else I can do to assist. Juanita Lichthardt returned my call, but we have not yet spoken. If you have a particular question for her that you would like me to raise, let me know.

Thank you all so much!

Elaine